



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 147-97-TV

Plant ID: 0072

Effective Date: ## XXXXXX 2000

Expiration Date: ## XXXXXX 2000

UTM Northing: 4223.6

UTM Easting: 611.5

SIC: 3711

NAICS: 336112

AFS: 00072

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

Ford Motor Company - Louisville Assembly Plant
Fern Valley Road at Grade Lane
Louisville, Kentucky 40213-3555

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Responsible Official: R. J. Kurtz

Applicant for Permit: Ford Motor Company

Title of Responsible Official: Plant Manager

Date Application Received: 21 April 1997

Date Application Administratively Complete: 14 May 1997

Date Public Notice Given: 27 August 2000

Reviewing Engineer (68)

Air Pollution Control Officer

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Abbreviations and Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industrial Classification System
NSR	- New Source Review
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year

UTM - Universal Transverse Mercator
VOC - Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner

or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

Louisville Assembly Plant, Ford Motor Company Part 70 Emissions Caps:

Part 70 Emissions Caps		
Pollutant	pounds/day	tons/year
VOC	17,259.2	1,832.5
PM	n/a	302.97
NO _x	n/a	39.9

Part 70 Emission Cap Additional Conditions:

The owner or operator shall maintain all records and emission calculations as described below to demonstrate compliance with the part 70 emission caps shown in the table above. Further, compliance with all other permit conditions and applicable regulations identified within this permit shall be demonstrated using the methods prescribed for each Emission Unit and for each Emission Point.

1. Compliance with applicable LAER emission rate and periodic (daily and annual) mass emission limits for the e-coat, guidecoat and topcoat systems shall be demonstrated using the record keeping and emission calculations described in "Protocol for Determining Daily VOC Emission Rate of Automobile and Light-Duty Truck Topcoat Operations, EPA 450/3-88-018, December, 1988."
2. Compliance with mass VOC emission limitations for sealer, black-out/wax, glass installation and purge/cleaning solvent operations, shall be demonstrated using mass balance calculation methods. Monthly material usage data and the applicable VOC content of each material shall be kept. Daily emission rates shall be determined by prorating monthly usage based on daily production levels.

$$VOC \text{ Value} = \sum_{i=1}^n U_i V_i (1 - C_i D_i)$$

Where:

U = material usage

V = VOC content

C = capture efficiency

D = destruction efficiency

i = number of operating days

The owner or operator shall correct capture and destruction efficiency values as appropriate to reflect equipment malfunction, downtime or other periods of reduced performance. Daily usage of each material shall be prorated from monthly values based on daily production:

$$U_{Daily} = U_{Monthly} \frac{P_{Daily}}{P_{Monthly}}$$

Where:

U_{Daily} = material usage for a particular calendar day

$U_{Monthly}$ = recorded material usage for a particular month

P_{Daily} = recorded vehicle production for a particular day

$P_{Monthly}$ = total vehicle production for a particular month

For these operations, the VOC content of each material used shall be determined using U.S. EPA Reference Method 24 or an approved alternative method.

3. To demonstrate compliance with plant-wide NO_x emission limits and to determine PM_{10} emissions associated with natural gas combustion, the owner or operator shall maintain monthly plant-wide natural gas usage records. Daily emissions shall be determined using prorated daily usage rates (based on production) and appropriate U.S. EPA AP-42 Emission Factors or vendor emissions data.

$$NO_x/PM_{10} \text{ Value} = \sum_{i=1}^n U_i EF (1 - C_i)$$

Where:

U = material usage

EF = emission factor

C = control efficiency

i = number of operating days

4. To demonstrate compliance with PM_{10} emission limits, the owner or operator shall maintain monthly material usage and emission calculation records. Daily emissions shall be determined using prorated daily usage rates, tested or derived transfer efficiency rates and tested or vendor derived particulate removal efficiency values.

$$PM_{10} \text{ Value} = \sum_{i=1}^n U_i (1 - TE_i)(1 - RE_i) + PM_{NG}$$

Where:

U = material usage

TE = transfer efficiency

RE = particulate removal efficiency

PM_{NG} = particulate from natural gas combustion (as determined above)

i = number of operating days

5. The owner or operator shall report quarterly to the District the following:
 - a. The beginning and ending date of the reporting period.
 - b. Pollutant monitored
 - c. Year-to-date emissions for each pollutant, except for VOCs, for which daily and year-to-date emissions shall be reported

These reports shall be made no later than 30 days following the end of each quarter.

(Regulation 2.16, sections 4.1.9.1.2, 4.1.9.2, and 4.1.9.3)

Part 70 Emission Cap Comments/Explanations:

1. The Part 70 Emission Caps are set at levels equal to the sum of the current allowables for the units affected by the caps.
2. New Source Review established criteria allowing an agency to presume the source-specific allowable emissions for the unit are equivalent to the actual emission for each of the individual units under it. Changes, operational or physical, resulting in emissions below the caps cannot produce significant increases in emissions.
3. The production caps (vehicles/day limits) have been eliminated with the implementation of the Part 70 Emission Caps.

U001 - U004 Emission Unit Description: Five boilers**U001 - U004 Applicable Regulations**

Federally Enforceable Regulations		
Number	Subject	Sections
6.07	Standards of Performance for Existing Indirect Heat Exchangers	1 through 4
6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities	1.2; and 2 through 5
7.06	Standards of Performance for New Indirect Heat Exchangers	1 through 4

U001 - U004 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID
						ID	Type	
E01A (U001)	Wickes boiler (No. 1); 73 MM Btu/hr; installed 1954; natural gas-fired, with coal backup***	6.07, sec 3.1	PM	0.24 lb/MM Btu*	MON	C01A	Multi-cyclone dust collector	S340
		6.07, sec 3.2 and 3.3	Opacity	20%; See AC 1.a.ii	MON			
		6.07, Sec 4	SO ₂	Gas-fired: 0.68 lb/MM Btu*	MON			
				Coal-fired: 1.20 lb/MM Btu*				
		6.42, Sec 4	NO _x RACT	See AC 5	MON			
E02A (U002)	Wickes boiler (No. 2); 146 MM Btu/hr; installed 1954; natural gas-fired, with coal backup***	6.07, sec 3.1	PM	0.24 lb/MM Btu*	MON	C02A	Multi-cyclone dust collector	S341
		6.07, sec 3.2 and 3.3 (except 3.3.3)	Opacity	20%; See AC 1.a.ii	MON			
		6.07, Sec 4	SO ₂	Gas-fired: 0.68 lb/MM Btu*	MON			
				Coal-fired: 1.20 lb/MM Btu*				
		6.42, Sec 4	NO _x RACT	See AC 5	MON			

U001 - U004 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E03A (U003)	Wickes boiler (No. 3); 146 MM Btu/hr; installed 1954; natural gas-fired, with coal backup***	6.07, sec 3.1	PM	0.24 lb/MM Btu*	MON	C03A	Multi-cyclone dust collector	S342
		6.07, sec 3.2 and 3.3 (except 3.3.3)	Opacity	20%; See AC 1.a.ii	MON			
		6.07, Sec 4	SO ₂	Gas-fired: 0.68 lb/MM Btu*	MON			
				Coal-fired: 1.20 lb/MM Btu*				
		6.42, Sec 4	NO _x RACT	See AC 5	MON			
E04A (U004)	Cleaver-Brooks boiler (No. 4); 63.6 MM Btu/hr; installed 1995; natural gas-fired, with propane backup	6.42, Sec 4	NO _x RACT	See AC 5	MON	N/A	N/A	S338
		7.06, sec 4.1.2	PM	0.10 lb/MM Btu**	MON			
		7.06, sec 4.2	Opacity	20%	MON			
		7.06, sec 6.1.1	NO _x	0.20 lb/MM Btu**	MON			
E04B (U004)	Cleaver-Brooks boiler (No. 5); 63.6 MM Btu/hr; installed 1995; natural gas-fired, with propane backup	6.42, Sec 4	NO _x RACT	See AC 5	MON	N/A	N/A	S339
		7.06, sec 4.1.2	PM	0.10 lb/MM Btu**	MON			
		7.06, sec 4.2	Opacity	20%	MON			
		7.06, sec 6.1.1	NO _x	0.20 lb/MM Btu**	MON			

*Based on total heat input capacity for Emission Points E01A through E03A.

**Based on total heat input capacity for Emission Points E01A through E04B.

***Note: Coal is used for emergency purposes only.

[†]Compliance Monitoring Reference Codes: **MON** - Parametric monitoring required, See Additional Conditions.

U001 - U004 Additional Conditions:**1. Standards** (Regulation 2.16, section 4.1.1)**a. Emission Points E01A through E03A:**

- i. PM: See Emission Points Table.
- ii. Opacity: See Emission Points Table. Additionally, pursuant to Regulation 6.07, sections 3.3.1 and 3.3.2, the following exceptions shall apply to the 20% opacity standard:
 - 1) Emissions into the open air of particulate matter during building a new fire, cleaning the fire box, or blowing soot for a period or periods aggregating not more than ten minutes in any 60 minutes which are less than 40% opacity.
 - 2) Emissions during startup operations if the emissions do not exceed the following:
 - A) First 30 minutes - 80% opacity;
 - B) Next hour - 60% opacity; and
 - C) Next 2 ½ hours - 40% opacity.
- iii. SO₂: See Emission Points Table.

b. Emission Points E04A and E04B:

- i. PM: See Emission Points Table.
- ii. Opacity: See Emission Points Table.
- iii. NO_x: See Emission Points Table.

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)**a. Emission Points E01A through E03A:**

- i. PM:
 - 1) Maintain records of monthly natural gas and coal usage.
 - 2) Perform fuel analysis or obtain supplier-certified fuel analysis for each shipment of coal to determine the weight percent of ash, which shall not exceed 6.3%.

- 3) Use AP-42 emission factors, fuel analysis data, fuel usage, and collection efficiency of the multi-cyclones to calculate monthly the PM emissions.
- 4) When the multiclones are operating (i.e., when coal is combusted), monitor their proper operation by recording daily the pressure drop for each device, which shall be maintained at $4.9 \text{ in H}_2\text{O} \pm 0.5$.

ii. Opacity:

- 1) When coal is being combusted, the owner or operator shall:
 - a) Conduct a daily one-minute visible emissions survey, during normal operation and daylight hours, of each Emission Point.
 - b) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance.
- 2) When natural gas is being combusted, the owner or operator shall:
 - a) Conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of each Emission Point.
 - b) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance.

iii. SO_2 :

- 1) Maintain records of monthly natural gas and coal usage.
- 2) Additionally for coal, perform fuel analysis or obtain supplier-certified fuel analysis for each shipment of coal to determine the weight percent of sulfur, which shall not exceed 0.73%.

b. Emission Points E04A and E04B:

- i. PM: Maintain records of monthly fuel usage, and use AP-42 emission factors, fuel analysis data, to calculate monthly emissions.
 - ii. Opacity:
 - 1) The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of each Emission Point.
 - 2) At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance.
 - iii. NO_x: Maintain records of monthly fuel usage, and use AP-42 emission factors, fuel analysis data, to calculate monthly emissions.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
- a. Emission Points E01A through E03A:
 - i. PM: See Additional Condition 2.a.i.
 - ii. Opacity: The owner or operator shall keep records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given day, then no visible emission survey needs to be performed and a negative declaration may be entered in the record.
 - iii. SO₂: See Additional Condition 2.a.iii.
 - b. Emission Points E04A and E04B:
 - i. PM: See Additional Condition 2.b.i.
 - ii. Opacity: The owner or operator shall keep records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given day, then no visible emission survey needs to be performed and a negative declaration may be entered in the record.
 - iii. NO_x: See Additional Condition 2.b.iii.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
 - a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
 - e. Description of the corrective action taken for each exceedance.
5. NO_x RACT Plan (1 January 2000)
 - a. The oxides of nitrogen (NO_x, expressed as NO₂) emission [*sic*] from each of Boiler #4 and Boiler #5 shall not exceed 0.20 pound per million Btu of heat input.
 - b. Ford Louisville Assembly Plant (Ford LAP) shall conduct an annual performance test for NO_x for each of Boiler #4 and Boiler #5. If the requirements of Regulation 6.42 *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities* section 5.1 are met, and subject to the annual performance test schedule reinstitution provision, performance testing may be done on a biennial schedule. Performance testing shall meet the following requirements:
 - i. Emissions concentrations and the mass determinations shall be obtained using Reference Methods of 40 CFR Part 60 Appendix A. The following methods shall be used:
 - 1) Method 1 or 1A, which furnishes guidance in site and traverse selection for sampling velocity at traverse points in stationary sources,
 - 2) Method 2, 2A, 2B, 2C, 2D, 2E, 2F, 2G, or 2H, which applies to measurements of gas volumetric flow rates,
 - 3) Method 3, 3A, 3B, or 3C, which is applicable for determining the concentrations of one or more of the following gases: carbon dioxide, O₂, CO, nitrogen, and methane,
 - 4) Method 4, which determines the moisture content in stack gases, and
 - 5) Method 7, 7A, 7B, 7C, 7D, or 7E, which provides the analytical method for determining the concentration of NO_x emissions from stationary sources.
 - ii. The use of other Reference Methods that are added to 40 CFR Part 60 Appendix A, alternative tests, or modifications to the Reference Methods listed in NO_x RACT

Plan Element (Element) No. 2.A. may be proposed by Ford LAP as part of the testing plan required by Element No. 2.D. Such methods may be used if approved in writing by the District.

- iii. Performance testing shall meet the requirements of Regulation 1.04 *Performance Tests* that are not addressed in this Element.
 - iv. A notification of intent to conduct a performance test shall be submitted to the District at least 25 working days in advance of the projected starting date for the performance test. The notification shall include the proposed test methods to be used.
 - v. If a pre-test conference to discuss the proposed test methods is deemed necessary by the District, a pre-test conference shall be arranged by District personnel.
 - vi. At least 10 working days' prior notice of the scheduled starting date for the performance test shall be provided to the District.
 - vii. A performance test report shall be submitted to the District within 60 days of completion of performance testing. The report shall include the calculations used to determine emissions. The NO_x emission rate shall be expressed in both pounds per hour and pounds per million Btu formats. The raw data shall be retained by Ford LAP for a minimum of 5 years and made available to the District upon request. Selected portions of the raw data used to calculate the emissions shall be included in the report in a format provided by the District.
- c. Boiler #1, Boiler #2, and Boiler #3 shall comply with the following requirements:
- i. No boiler shall have a monthly capacity factor greater than 10.0 % for any month during the period March 1 to October 31. The term "monthly capacity factor" means the ratio between the actual heat input to a boiler from fuel combusted during a month and the potential heat input to the boiler had it been operated for 24 hours per day for the number of days in the month at the maximum steady state design heat input capacity. The maximum heat input capacity provided by the manufacturer shall be used unless Ford LAP determines the maximum heat input capacity using the heat loss method described in sections 5 and 7.3 of the ASME *Power Test Codes* 4.1, and
 - ii. No boiler shall combust a fuel other than natural gas, distillate oil, or residual oil.
- d. Ford LAP shall make a record of the type and amount of fuel combusted during each day of operation of Boiler #1, Boiler #2, or Boiler #3 during the period March 1 to October 31. Ford LAP shall, at the end of each month during this period, calculate and record, for each of Boiler #1, Boiler #2, and Boiler #3, the monthly capacity factor. Each record shall be maintained for a minimum of 5 years and made available to the District upon request.

- e. Ford LAP shall keep a record identifying all deviations from the requirements of this NO_x RACT Plan and shall submit to the District a written report of all deviations that occurred during the preceding semi-annual period. Semi-annual periods shall run from January 1 to June 30 and July 1 to December 31. The report shall contain the following information:
 - i. The boiler number,
 - ii. The beginning and ending date of the reporting period,
 - iii. Identification of all periods during which a deviation occurred,
 - iv. A description, including the magnitude, of the deviation,
 - v. If known, the cause of the deviation, and
 - vi. A description of all corrective actions taken to abate the deviation.

If no deviation occurred during the semi-annual period, the report shall contain a negative declaration. Each report shall be submitted within 60 days following the end of the semi-annual period.

- f. In lieu of the requirements in this NO_x RACT Plan, Ford LAP may comply with alternative requirements regarding emission limitations, equipment operation, test methods, monitoring, record keeping, or reporting, provided the following conditions are met:
 - i. The alternative requirements are established and incorporated into an operating permit pursuant to a Title V Operating Permit issuance, renewal, or significant permit revision process as established in Regulation 2.16,
 - ii. The alternative requirements are consistent with the streamlining procedures and guidelines set forth in section II.A. of *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, March 5, 1996, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. The overall effect of compliance with alternative requirements shall consider the effect on an intrinsic basis, such as pounds per million Btu,
 - iii. The U.S. Environmental Protection Agency (EPA) has not objected to the issuance, renewal, or revision of the Title V Operating Permit, and either
 - iv. If the public comment period preceded the EPA review period, then the District had transmitted any public comments concerning the alternative requirements to EPA with the proposed permit, or

- v. If the EPA and public comment periods ran concurrently, then the District had transmitted any public comments concerning the alternative requirements to EPA no later than 5 working days after the end of the public comment period.

The District's determination of approval of any alternative requirements is not binding on EPA. Noncompliance with any alternative requirement established pursuant to the Title V Operating Permit process constitutes a violation of the NO_x RACT Plan.

U001 - U004 Comments/Explanations:

1. The multiclones for Emission Points E01A through E03A are not capable of flyash reinjection from the decantation hopper. These collectors are used only when coal is combusted.
2. The SO₂ emission standard for Emission Points E04A and E04B (Regulation 7.06, section 5.1.3.1) is not applied because only natural gas and propane are combusted in these boilers, yielding negligible SO₂ emissions.

U005 - U007 Emission Unit Description: Three heat cleaning ovens with internal afterburners

U005 - U007 Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
7.08	Standards of Performance for New Process Operations	1 through 4

U005 - U007 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E05A	Bayco heat cleaning oven (No. 1); 1.5 MM Btu/hr; with internal afterburner; natural gas-fired, with propane backup	7.08, sec 3.1.2	PM	2.34 lbs/hr	ONE	N/A	N/A	S320
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		7.08, sec 4.1	NO _x	300 ppmv or no visible discharge	ONE			
E06A	Bayco heat cleaning oven (No. 2); 1.5 MM Btu/hr; with internal afterburner; natural gas-fired, with propane backup	7.08, sec 3.1.2	PM	2.34 lbs/hr	ONE	N/A	N/A	S321
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		7.08, sec 4.1	NO _x	300 ppmv or no visible discharge	ONE			
E07A	Bayco heat cleaning oven (No. 3); 4 MM Btu/hr; with internal afterburner; natural gas-fired, with propane backup	7.08, sec 3.1.2	PM	2.34 lbs/hr	ONE	N/A	N/A	S322
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		7.08, sec 4.1	NO _x	300 ppmv or no visible discharge	ONE			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **ONE** - One-time compliance demonstration that limit cannot be exceeded.

U005 - U007 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. PM: See Emission Points Table.
 - b. Opacity: See Emission Points Table.
 - c. NO_x: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. PM: None.
 - b. Opacity: For each particulate matter (PM) Emission Point subject to Regulation 7.08 (section 3.1.1), the owner or operator shall not cause or permit the discharge of emissions equal to or greater than 20% opacity.
 - i. To demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of stacks for emission Points E05A through E07A.
 - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
 - iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.b.i.
 - c. NO_x: None.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. PM: None.
 - b. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible

emission survey needs to be performed and a negative declaration may be entered in the record.

- c. NO_x: None.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
 - e. Description of the corrective action taken for each exceedance.

U008 Emission Unit Description: Volatile Organic Liquid Storage Tanks**U008 Applicable Regulations**

Federally Enforceable Regulations		
Number	Subject	Sections
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1 through 5; 7 and 8
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)	1 through 6

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
7.02	Federal New Source Performance Standards Incorporated by Reference	1.23, 2 through 5

U008 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring[†]	Control Device		Stack ID
						ID	Type	
E08A	Methanol Tank	7.12, sec 3.3	VOC	Submerged fill	NONE	N/A	N/A	S350
E08G	UG Solvent Tank	5.12, secs 1 and 5	TAP(s)	See AC 2.b.	MON	N/A	N/A	S356
		7.12, sec 3.3	VOC	Submerged fill	NONE			
E08H	Gasoline Tank #1	1.05, Sec 4	VOC	See AC 2.a.	MON	N/A	N/A	S357
		7.15, sec 3	VOC	Stage I vapor recovery system	NONE			
E08I	Gasoline Tank #2	1.05, Sec 4	VOC	See AC 2.a.	MON	N/A	N/A	S358
		7.15, sec 3	VOC	Stage I vapor recovery system	NONE			

U008 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E08M	Anti-Freeze Tank	5.12, secs 1 and 5	TAP(s)	See AC 2.b.	MON	N/A	N/A	S362
		7.12, sec 3.3	VOC	Exempt (Vapor pressure < 1.5 psia)	NONE			
E08N	Power Steering Fluid Tank	5.12, secs 1 and 5	TAP(s)	See AC 2.b.	MON	N/A	N/A	S363
		7.12, sec 3.3	VOC	Exempt (Vapor pressure < 1.5 psia)	NONE			
E08O	Brake Fluid Tank	5.12, secs 1 and 5	TAP(s)	See AC 2.b.	MON	N/A	N/A	S364
		7.12, sec 3.3	VOC	Exempt (Vapor pressure < 1.5 psia)	NONE			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

U008 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC: See Emission Points Table. Additionally, Emission Points E08H and E08I shall be equipped with the following:
 - i. A submerged fill pipe;
 - ii. If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;
 - iii. Vent line restrictions on the affected facility; and
 - iv. Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recovery. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District.
 - b. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC: To demonstrate ongoing compliance with Regulation 1.05, Section 4, the owner or operator shall record the quantity of gasoline used to fuel vehicles.
 - b. TAPs:
 - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
 - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
 - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC: See Additional Condition 2.a.
 - b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
 - e. Description of the corrective action taken for each exceedance.

U008 Comment/Explanation:

Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

U009 Emission Unit Description: Windshield and back lights installation operation

U009 Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance With Emission Standards Maintenance Requirements	1; 3 through 5
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 7

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U009 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring[†]	Control Device		Stack ID
						ID	Type	
E09A	Glass, Windshield, and Back Lights Installation	1.05, Sec 4	VOC	Same as for 7.59, sec 3.1.4	NONE	N/A	N/A	N/A
		5.12, secs 1 and 5	TAP(s)	See AC 2.b	MON			
		7.59, sec 3.1.2	VOC	3.5 lbs/gal, less H ₂ O and exempt VOCs, as applied	MON			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

U009 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC: Not cause or allow the emission of VOC resulting from the coating of metallic surfaces in excess of the of the applicable emission rate of 3.5 lb of VOC/gal of coating excluding water and exempt solvents, as applied. (Regulation 7.59, section 3.1.2) Compliance shall be demonstrated using the volume-weighted average VOC content for all materials utilized in this Emission Unit. The usage rates of each materials shall be determined as defined in Additional Condition 2.a.
 - b. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC: Maintain the following monthly records to demonstrate ongoing compliance with the corresponding hourly emission limits for VOCs and with Regulation 1.05, Section 4:
 - i. Hours of operation for each booth
 - ii. Calculations of VOC emissions from each facility based on the recorded parameters. Calculations of daily usage and VOC emissions from each facility based on the recorded parameters by prorating monthly net usage based on daily vehicle production.
 - iii. Determine daily usage of each material and VOC emissions by prorating monthly consumption based on daily vehicles produced.
 - b. TAPs:
 - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
 - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
 - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC: See Additional Condition 2.a.

- b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
 - e. Description of the corrective action taken for each exceedance.

U009 Comments/Explanations:

Additional Condition 2.b is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

U010 Emission Unit Description: E-Coat System; Electrocoat prime dip tank with cure ovens

U010 Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance with Emission Standards and Maintenance	1; and 3 through 5
2.04	Construction or Modification of Major Sources In or Impacting Upon Non-Attainment Areas (Emission Offsets Requirements)	1 through 10
40 CFR 60 MM	Standard of Performance for Automobile and Light Duty Truck Surface Coating Operations	60.390 through 60.397

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
7.02	Federal New Source Performance Standards Incorporated by Reference	1.50; and 2 through 5

U010 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E10A	E-Coat Prime Dip Tank	1.05, Sec 4	VOC	Same as for 40 CFR 60.392	NONE	N/A	N/A	S040
		5.12, secs 1 and 5	TAP(s)	See AC 2.c.	MON			
		40 CFR 60.392	VOC	1.34 lbs of VOC/gal coating, less H ₂ O and exempt VOCs; as applied	MON			

U010 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E10B	E-Coat Oven	1.05, Sec 4	VOC	Same as for 40 CFR 60.394	NONE	C10A	Afterburner (natural gas-fired)	S041 through S045
		5.12, secs 1 and 5	TAP(s)	See AC 2.c.	MON			
		40 CFR 60.394	VOC	See AC 1.a	MON			
E10C	Third Pass E-Coat Oven	1.05, Sec 4	VOC	Same as for 40 CFR 60.394	NONE	C10B	Afterburner (natural gas-fired)	S049 and S050
		5.12, secs 1 and 5	TAP(s)	See AC 2.c.	MON			
		40 CFR 60.394	VOC	See AC 1.a	MON			
E17A	E-Coat Prime Scuff Booth	7.08	PM	2.34 lbs/hr	PMP	C17A	Fabric filter	S17A
		7.08	Opacity	< 20%	NONE			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

U010 Additional Conditions:1. **Standards** (Regulation 2.16, section 4.1.1)

- a. VOC: The owner or operator shall be subject to the following emission limits (40 CFR 60.392):
 - i. When the solids turnover ratio (R_T) is ≥ 0.16 , not exceed 1.4 lbs/gal (0.17 kg/l) of applied coating solids.
 - ii. When the R_T is ≥ 0.04 and < 0.16 , not exceed the weight per gallon limit calculated as follows:
$$0.17 \times 350^{(0.160 - R_T)} \text{ kg of VOC per liter of applied coating solids.}$$
 - iii. When the R_T is < 0.040 , not be subject to an emission limit established pursuant to this regulation.
 - iv. At least 80% of the VOC emissions generated must exhaust through the oven to the afterburners.
- b. PM: See Emission Points Table.
- c. TAPs: See Emission Points Table.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

- a. VOC:
 - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings (including resin, pigment, and flow control additive) used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
 - ii. During operation of this line, maintain the afterburners combustion chamber temperature at $\geq 760^\circ \text{C}$, except that it shall not in a three hour average have a temperature drop of more than 28°C , monitored to an accuracy within 2.5°C ; or other temperature, as determined during the latest stack test, monitored to an accuracy within 2.5°C . Additionally, the afterburners shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.

- iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.
- iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
- v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

VOC_w = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

n = number of different coatings used on a coating line a given day.

V₁ = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

C₁ = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

V_t = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- vi. Meet the standards specified in 40 CFR 60.392, as calculated using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
- b. The owner or operator shall not operate the scuff booth unless the particulate filters are installed and operating properly. The owner or operator shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
- c. TAPs:

- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
 - ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
 - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
 - i. Record daily the quantity of resin, pigment, and flow control additive added to the electrocoat system.
 - ii. Determine and record daily usage of each material by prorating monthly consumption based on daily vehicles produced.
 - iii. Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the afterburners were not operating. The owner or operator shall also maintain records of control device downtimes and bypasses, including the date and duration of each occurrence.
 - b. PM: See Additional Condition 2.b.
 - c. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
 - a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
 - e. Description of the corrective action taken for each exceedance; and

- f. Occurrences and duration of each downtime and bypass.

U010 Comments/Explanations:

1. Additional Condition 2.c is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
2. Due to the nature of the process of E17A, no opacity monitoring is required, as the likelihood of visible emissions is nil.

U011 Emission Unit Description: Guidecoat System, spray booth with cure ovens.

U011 Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance With Emission Standards Maintenance Requirements	1; 3 through 5
7.08	Standards of Performance for New Process Operations	1 through 3
7.59	Standard of Performance for New Miscellaneous Metal Parts Products Surface Coating Operations	1 through 7
40 CFR 60 MM	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations	60.390 through 60.397

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
7.02	Federal New Source Performance Standards Incorporated by Reference	1.50; and 2 through 5

U011 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E11A, E11C, and E11D	Guidecoat (primer surfacer) Booth; Ovens; and Air Supply House	1.05, Sec 4	VOC	Same as for 40 CFR 60.392	NONE	C11A	Wet scrubber	S080 through S098; S179 through S182
		5.12, secs 1 and 5	TAP(s)	See AC 2.d	MON			
		40 CFR 60.392	VOC	1.4 lbs VOC/gal	MON			

U011 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E11B	Touch-up and Blackout Booth and Oven	1.05, Sec 4	VOC	Same as for 7.59	NONE	C11B	Fabric filter	S179 through S182
		5.12, secs 1 and 5	TAP(s)	See AC 2.d	MON			
		7.08, sec 3.1.2	PM	2.34 lb/hr	MON			
		7.08, sec 3.1.1	Opacity	< 20%	PMP			
		7.59, sec 3.1.4	VOC	3.0 lbs/gal, less H ₂ O and exempt VOCs, as applied	MON			
E11E	Guidecoat/Topcoat Paint Kitchen	1.05, Sec 4	VOC	Same as for 7.59	NONE	N/A	N/A	N/A
		7.59, sec 3.1.4	VOC	3.0 lbs/gal, less H ₂ O and exempt VOCs, as applied	MON			
E18A	Prime Scuff Booth	7.08	PM	2.34 lbs/hr	PMP	C18A	Fabric filter	S18A
		7.08	Opacity	< 20%	NONE			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required; **PMP** - Preventive Maintenance Program, See Additional Conditions.

U011 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC: The owner or operator shall be subject to the following emission limit 15.1 lbs VOC/gal (1.8 kg/l) of applied coating solids, less water and exempt solvents. (40 CFR 60.392)
 - b. PM: See Emission Points Table.
 - c. Opacity: See Emission Points Table.
 - d. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC:
 - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
 - ii. During operation of this line, maintain the afterburners combustion chamber temperature at $\geq 760^{\circ}\text{C}$, except that it shall not in a three hour average have a temperature drop of more than 28°C , monitored to an accuracy within 2.5°C ; or other temperature, as determined during the latest stack test, monitored to an accuracy within 2.5°C . Additionally, the afterburners shall have a minimum destruction efficiency of 95% and a minimum residence time of 0.5 seconds. The temperature shall be recorded using a circular type chart recorder, which shall be calibrated and maintained according to the manufacturer's specifications.
 - iii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.
 - iv. Measure capture efficiency pursuant to Regulation 1.05, Section 3, except that EPA Method 204F, Volatile Organic Compounds Content in Liquid Input Stream (Distillation Approach), shall be used to determine VOC input.
 - v. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

VOC_w = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

n = number of different coatings used on a coating line a given day.

V_i = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

C_i = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

V_t = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

b. PM: The owner or operator shall not operate the booths unless the particulate filters are installed and operating properly. The owner or operator shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.

c. Opacity: None.

d. TAPs:

- i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.
- ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
 - i. Record the quantity of paint and dilution solvent added to the guidecoat (primer surfacer) application daily.
 - ii. Combine daily pour records with monthly tank level readings to determine monthly paint usage.
 - iii. Determine daily paint usage of each material by prorating consumption based on daily surface area coated.
 - iv. Determine daily usage and emissions by using calculation procedures in Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Truck Topcoat Operations, EPA-450/3-88-018.
 - v. Calculations shall incorporate control efficiency and shall include downtime adjustments to account for increased emissions during the period the RTO was not operating. The owner or operator shall also maintain records of control device downtimes and bypasses, including the date and duration of each occurrence.
 - vi. Report all instances of non-compliance to the District no later than fifteen (15) days after the occurrence has been confirmed, notwithstanding Regulation 1.07.
 - vii. Meet the standards specified in 40 CFR 60.392, as calculated, using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
 - b. PM: See Additional Condition 2.b.
 - c. Opacity: None.
 - d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
- a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);

- e. Description of the corrective action taken for each exceedance; and
- f. Occurrences and duration of each downtime and bypass.

U011 Comments/Explanations:

1. Due to the nature of the processes of E11B and E18A, no opacity monitoring is required, as the likelihood of visible emissions is nil.
2. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

U012 Emission Unit Description: Enamel Topcoat System; Topcoat spray booths with scrubber, curing ovens, air supply houses, & VOC control devices

U012 Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance With Emission Standards Maintenance Requirements	1; 3 through 5
7.08	Standards of Performance for New Process Operations	1 through 3
40 CFR 60 MM	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations	60.390 through 60.397

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
7.02	Federal New Source Performance Standards Incorporated by Reference	1.50; and 2 through 5

U012 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E12A and E12B	North Main Enamel Booth; Air Supply House; and Oven	1.05, sec 4	VOC	Same as for 40 CFR 60.392	NONE	C12A, C12B, and C12C	Water curtain, carbon adsorption system, and afterburner (natural gas-fired)	S125 through S149; S203; S204; S215; and S189 through S192
		5.12, secs 1 and 5	TAP(s)	See AC 2.d	MON			
		7.08, sec 3.1.2	PM	2.34 lbs/hr	MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		40 CFR 60.392	VOC	See AC 1.a	MON			

U012 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring†	Control Device		Stack ID
						ID	Type	
E12C and E12D	South Main Enamel Booth; Air Supply House; and Oven	1.05, sec 4	VOC	Same as for 40 CFR 60.392	NONE	C12C and C12E	Afterburner (natural gas-fired) and water curtain	S150 through S174; S193 through S196; S203; S204; and S215
		5.12, secs 1 and 5	TAP(s)	See AC 2.d	MON			
		7.08, sec 3.1.2	PM	2.34 lbs/hr	MON			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		40 CFR 60.392	VOC	See AC 1.a	MON			
E12E and E12F	TuTone/Repair Topcoat Booth; Air Supply House; and Oven	1.05, sec 4	VOC	Same as for 40 CFR 60.392	NONE	C12F	Water curtain	S110 through S124; and S197 through S202
		5.12, secs 1 and 5	TAP(s)	See AC 2.d	MON			
		7.08, sec 3.1.2	PM	2.34 lbs/hr	PMP			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		40 CFR 60.392	VOC	See AC 1.a	MON			
E12G	Guidecoat/Topcoat Paint Kitchen	1.05, Sec 4	VOC	Same as for 40 CFR 60.392	NONE	N/A	N/A	N/A
		40 CFR 60.392	VOC	See AC 1.a	MON			
E12H	Topcoat Scuff Booth	7.08	PM	2.34 lbs/hr	PMP	C19A	Fabric filter	S19A
		7.08	Opacity	< 20%	NONE			
E12I	TuTone/Repair Scuff Booth	7.08	PM	2.34 lbs/hr	PMP	C20A	Fabric filter	S20A
		7.08	Opacity	< 20%	NONE			

†Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **PMP** - Preventive Maintenance Program, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

U012 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC: Pursuant to 40 CFR 60.392 The owner or operator shall be subject to the emission limit of 4.8 lbs VOC/gal (0.58 kg/l) of applied coating solids, less water and exempt solvents.
 - b. PM: See Emission Points Table.
 - c. Opacity: See Emission Points Table.
 - d. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC:
 - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
 - ii. This line shall not be operated unless all control devices are being properly operated, except in the event of a shutdown, startup, malfunction, or emergency; and where the requirements of Regulation 1.07 are met.
 - iii. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

VOC_w = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

n = number of different coatings used on a coating line a given day.

V_i = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

C_1 = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

V_t = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- iv. Meet the standards specified in 40 CFR 60.392, as calculated, using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
- b. PM: See Additional Condition 2.a.ii for Emission Points E12A through E12F. For Emission Points E12H and E12I, the owner or operator shall not operate the booths unless the particulate filters are installed and operating properly. The owner or operator shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
- c. Opacity: For each particulate matter (PM) Emission Point subject to Regulation 7.08 (section 3.1.1) and having monitoring requirements (Compliance Monitoring indicated as “MON”), the owner or operator shall not cause or permit the discharge of emissions equal to or greater than 20% opacity.
 - i. To demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of stacks for Emission Points E12A, E12C, and E12E.
 - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
 - iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i.
- d. TAPs:
 - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and

continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.

- ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
 - i. Record daily the quantity and type of paint withdrawn from the topcoat paint circulation system for use in the final repair operation.
 - ii. Determine daily VOC emissions based on the topcoat and final repair records.
 - iii. As an alternative to daily material usage records, the owner or operator may utilize an appropriate material usage factor determined to be acceptable by the District.
- b. PM: None for Emission Points E12A through E12F. For Emission Points E12H and E12I, see Additional Condition 2.b.
- c. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.
- d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

- a. Emission Unit ID number and Control ID number;
- b. The beginning and ending date of the reporting period;
- c. Identification of the operating parameters being monitored;

- d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
- e. Description of the corrective action taken for each exceedance;
- f. Occurrences and duration of each downtime and bypass.

U012 Comment/Explanation:

1. Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
2. Due to the nature of the processes of E12H and E12I, no opacity monitoring is required, as the likelihood of visible emissions is nil.

U013 Emission Unit Description: Plant-wide Product Fueling**U-13 Applicable Regulations**

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance With Emission Standards Maintenance Requirements	1; 3 through 5
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)	1 through 6
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U-13 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring[†]	Control Device		Stack ID
						ID	Type	
E13A	Gasoline Tank #1	1.05, Sec 4	VOC	See AC 3.b	MON	N/A	N/A	S359
		7.15, sec 3	VOC	Stage I vapor recovery system	NONE			
E13B	Gasoline Tank #2	1.05, Sec 4	VOC	See AC 3.b	MON	N/A	N/A	S360
		7.15, sec 3	VOC	Stage I vapor recovery system	NONE			
E13C	Gasoline Tank #3	1.05, Sec 4	VOC	See AC 3.b	MON	N/A	N/A	S361
		7.15, sec 3	VOC	Stage I vapor recovery system	NONE			
E13D	Two Fueling Stations with Vapor Recovery	7.25, Sec 3.1	VOC	See Comment	MON	C23B	Thermal Oxidizer	S270

Permit No.: 147-97-TV

Plant ID: 0072

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

U-13 Additional Conditions:**1. Standards** (Regulation 2.16, section 4.1.1)**VOC:**

- a. Storage tanks, Emission Points E13A through E13C, shall be equipped with the following:
 - i. A submerged fill pipe;
 - ii. If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;
 - iii. Vent line restrictions on the affected facility; and
 - iv. Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recovery. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District.
- b. For control equipment (Emission Point E13D), the owner or operator shall maintain a gasoline fueling vapor collection and destruction system pursuant to Regulation 7.25, section 3.1 (BACT). See Comment.

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)**VOC:**

- a. Storage tanks: To demonstrate ongoing compliance with Regulation 1.05, Section 4, the owner or operator shall record the quantity of gasoline used to fuel vehicles.
- b. Control equipment:
 - i. The owner or operator shall daily:
 - 1) Check burner monitoring box for proper burner operation;
 - 2) Check the vent gauge and verify the reading to be at zero, plus or minus ½ inches of water; and

- 3) Verify flame present in oxidizing unit.
 - 4) All repairs must be completed within 5 working days.
 - ii. The owner or operator shall monthly:
 - 1) Verify the “air over liquid” reading which demonstrates the collection efficiency of the system;
 - 2) Check fueling nozzles and hoses for abrasion and tears, if found, replace the damaged part;
 - 3) Check the storage tank fill points for tightness;
 - 4) If a two point vapor recovery system on the storage tank, check rubber gaskets for tares, verify spring loaded valves properly operate and tank refill caps have rubber gaskets in good condition; replace any damaged parts; and
 - 5) All repairs must be completed within 5 working days.
 - iii. The owner or operator shall annually:
 - 1) Perform a certified pressure decay test on system to be witnessed by the District;
 - 2) Conduct training for all personnel responsible for the proper maintenance and operation of the system; and
 - 3) All repairs must be completed within 5 working days.
 - 4) Verify pressure vacuum valve on vent pipe is operating properly annually and replace any damaged part.
 - iv. For any tests failed, the owner or operator shall make any required repairs and retest within 30 days.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
- a. Storage Tanks: None.
 - b. Control Equipment:
 - i. The owner or operator shall maintain daily records of the daily inspections. These records shall contain the date and time of the inspection; who performed the inspection; and the results of the inspection.

- ii. The owner or operator shall maintain records of the monthly inspections. These records shall contain the date and time of the inspection; who performed the inspection; and the results of the inspection.
 - iii. The owner or operator shall maintain records of the annual tests. These records shall contain the date and time of the test; who performed the test; and the results of the test.
 - iv. The owner or operator shall maintain a log of the annual training. This log shall contain the names of the trainer and all trainees; a brief summation of the training; and the date of the training.
 - c. The owner or operator shall record total monthly gasoline throughput and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3)
- a. Storage Tanks: None.
 - b. Control Equipment:

The owner or operator shall report semi-annually the following:
 - i. Results of the annual pressure decay tests;
 - ii. Any corrective action taken or repairs made on the system; and
 - iii. Any repairs that were not completed within the prescribed 5 days; or
 - iv. A negative declaration, if no actions or activities above were required

U-13 Comment/Explanation:

The collection unit, located on the plant roof, draws the fuel vapors through a common manifold. When the collected fuel vapor reaches a positive measured pressure of 1 inch water column, it is discharged to the incinerators.

U014 Emission Unit Description: Paint Equipment Cleaning Booth**U014 Applicable Regulations**

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance With Emission Standards Maintenance Requirements	1; 3 through 5
6.17	Standard of Performance for Existing Automobile and Truck Surface Coating Operations	1 through 4

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U014 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring[†]	Control Device		Stack ID
						ID	Type	
E14A	Paint Equipment Cleaning Booth	1.05, Sec 4	VOC	Same as for 6.17, Sec 3	NONE	C14A	Fabric filter	S14A
		5.11, secs 1 and 6	TAP(s)	See AC 2.b	MON			
		6.17, Sec 3	VOC	See AC 1.a	MON			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

U014 Additional Conditions:**1. Standards** (Regulation 2.16, section 4.1.1)

- a. VOC: The owner or operator shall follow the procedure below to minimize VOC emissions from purge and cleaning operations:

i. Body Wipe:

- 1) Solvents shall be dispensed from pails equipped with properly functioning lids that will remain closed when not in use
- 2) Miscible solvents shall be mixed with deionized water
- 3) Sticky tack cloths shall be used where possible

ii. Applicator Paint Purging:

- 1) The automatic spray applicators will incorporate will incorporate a purge paint and solvent recovery system that will collect ninety percent (90%) of the purged materials
- 2) Compressed air will be used to enhance scrubbing action
- 3) Water-based base coat will be purged with deionized water and alcohol

iii. Spray Booth and Equipment Cleaning:

- 1) Pressurized water and solvent will be used to remove uncured paint
- 2) Sprayable and paper masking will be used, where possible, to minimize cleaning
- 3) High-pressure water scrubber will be used to remove over spray from floor grating
- 4) A non-VOC-containing coating will be applied to booth walls to act as a masking, which shall be removed by low-pressure water or steam
- 5) Manual spray applicators and hoses shall be removed and immersed in a drum of solvent, then wiped clean
- 6) Some portions of the automatic spray applicator will be covered with removable paper masking

iv. Other Areas:

- 1) Paint track-out from booths shall be removed by mopping with a detergent containing solvent.
 - 2) Removable floor mats and disposable paper covering will be used in high-traffic areas to minimize the need for the previous item.
- b. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC: See Additional Condition 1.a.
 - b. TAPs:
 - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
 - ii. Continue to comply with Regulation 5.11 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
 - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC: See Additional Condition 1.a.
 - b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
 - a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
 - e. Description of the corrective action taken for each exceedance.

U014 Comments/Explanations:

1. Additional Condition 2.b is for demonstrating compliance with Regulation 5.11, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
2. Additional Conditions 1.a.i through iii, involving work practice standards only, have no monitoring requirements, as such would be impractical.

U015 Emission Unit Description: Sealer Deck; body sealer, drip rail sealer, and PVC anti-chip coating are applied to vehicle bodies

U015 Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance with Emission Standards and Maintenance Requirements	1; and 3 through 5
2.04	Construction or Modification of Major Source In or Impacting Upon Non-Attainment Areas (Emission Offset Requirement)	
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1 through 7

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutant	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U015 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/Standard	Allowable Emission/Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E15A	Body Sealer Application	1.05, Sec 4	VOC	Same as for 6.31, sec 3.1.4	MON	N/A	N/A	N/A
		5.11, secs 1 and 6	TAP(s)	See AC 2.b	MON			
		7.59, sec 3.1.4	VOC	3.0 lbs/gal, less H ₂ O and exempt VOCs, as applied	MON			

U015 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E15B	Drip Rail Sealer Application	1.05, Sec 4	VOC	Same as for 6.31, sec 3.1.4	MON	N/A	N/A	N/A
		5.11, secs 1 and 6	TAP(s)	See AC 2.b	MON			
		7.59, sec 3.1.4	VOC	3.0 lbs/gal, less H ₂ O and exempt VOCs, as applied	MON			
E15C	PVC Coating Application	1.05, Sec 4	VOC	Same as for 6.31, sec 3.1.4	MON	N/A	N/A	N/A
		5.11, secs 1 and 6	TAP(s)	See AC 2.b	MON			
		7.59, sec 3.1.4	VOC	3.0 lbs/gal, less H ₂ O and exempt VOCs, as applied	MON			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions.

U015 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC: See Emission Points Table.
 - b. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC: Demonstrate ongoing compliance with Regulation 6.31, section 3.1.4 by recording daily changes of drums and totes. Determine daily usage of each material by prorating monthly consumption based on daily vehicles produced. Record the amount of surface preparation, clean up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the averaging period. (Regulation 6.31, section 6.1.6, and 2.16, section 4.1.9.1.2)
 - b. TAPs:
 - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
 - ii. Continue to comply with Regulation 5.11 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
 - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC: See Additional Condition 2.a.
 - b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
 - a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;

- c. Identification of the operating parameters being monitored;
- d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
- e. Description of the corrective action taken for each exceedance.

U015 Comments/Explanations:

Additional Condition 2.b is for demonstrating compliance with Regulation 5.11 standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

U016 Emission Unit Description: Final Repair Spray Booth; infrared curing, and spot repair bays for repairing coating on vehicles

U016 Applicable Regulations

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance with Emission Standards and Maintenance Requirements	1; and 3 through 5
7.08	Standards of Performance for New Process Operations	1 through 3
40 CFR 60 MM	Standard of Performance for Automobile and Light-Duty Truck Surface Coating Operations	

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2
7.02	Federal New Source Performance Standards Incorporated by Reference	1.50; and 2 through 5

U016 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
E16A and E16B	Final Repair Booth and Oven	1.05, sec 4	VOC	Same as for 40 CFR 60.392	NONE	C16A	Fabric filter	S16A and S16B
		5.12, secs 1 and 5	TAP(s)	See AC 2.d	MON			
		7.08, sec 3.1.2	PM	2.34 lbs/hr	PMP			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		40 CFR 60.392	VOC	See AC 1.a	MON			
E16C	Final Repair Spot Repair	1.05, sec 4	VOC	Same as for 40 CFR 60.392	NONE	N/A	N/A	S16C

U016 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring [†]	Control Device		Stack ID
						ID	Type	
		5.12, secs 1 and 5	TAP(s)	See AC 2.d	MON			
		7.08, sec 3.1.2	PM	2.34 lbs/hr	PMP			
		7.08, sec 3.1.1	Opacity	< 20%	MON			
		40 CFR 60.392	VOC	See AC 1.a	MON			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **PMP** - Preventive Maintenance Program, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

U016 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC: Pursuant to 40 CFR 60.392 The owner or operator shall be subject to the emission limit of 4.8 lbs VOC/gal (0.58 kg/l) of applied coating solids, less water and exempt solvents.
 - b. PM: See Emission Points Table.
 - c. Opacity: See Emission Points Table.
 - d. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC:
 - i. Monitor ongoing compliance by calculating monthly, a daily a volume-weighted average of the coatings used. Procedures used for this determination shall be those of Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Truck Topcoat Operations, EPA-450/3-88-018, December 1988.
 - ii. Use EPA Method 24 to determine the amount of VOC in the Coating. The following equation may be used as an alternate method to demonstrate compliance:

$$VOC_w = \sum_{i=1}^n \frac{V_i C_i}{V_t}$$

Where:

VOC_w = the daily weighted average coating VOC content, as applied; and less water and exempt solvents, expressed in pounds of VOC per gallon of coating.

n = number of different coatings used on a coating line a given day.

V_i = the volume of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

C_i = the VOC content of each coating used on a coating line, as applied and less water and exempt solvents, a given day.

V_t = total volume of all coatings applied each day on a coating line, less water and exempt solvents.

- iv. Meet the standards specified in 40 CFR 60.392, as calculated, using the prescribed transfer efficiency of 40 CFR 60.393(c)(1)(i)(C) for the monthly weighted average mass of VOC emitted per volume of applied coating solids.
- b. PM: The owner or operator shall not operate the Final Repair Booth unless the particulate filters are installed and operating properly. The owner or operator shall follow good operating practices for the particulate filters, including periodic inspection, routine maintenance as recommended by the manufacturer, and prompt repair of any defects. Proper operation of the fabric filter shall be ensured by maintaining records of inspections and routine maintenance activities and shall make these records available to the District upon request.
- c. Opacity: For each particulate matter (PM) Emission Point subject to Regulation 7.08 (section 3.1.1), the owner or operator shall not cause or permit the discharge of emissions equal to or greater than 20% opacity.
 - i. To demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of stacks for Emission Points E16A through E16C.
 - ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
 - iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.c.i.
- d. TAPs:
 - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits. The specific indicators of control device performance are specified elsewhere in this permit.

- ii. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
 - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
- 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC: Perform record keeping for VOCs for 40 CFR 60.395 and 1.05, Section 4:
 - i. Record daily the quantity and type of paint withdrawn from the topcoat paint circulation system for use in the final repair operation.
 - ii. Determine daily VOC emissions based on the topcoat and final repair records.
 - iii. As an alternative to daily material usage records, the owner or operator may utilize an appropriate material usage factor determined to be acceptable by the District.
 - b. PM: See Additional Condition 2.b.
 - c. Opacity: Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.
 - d. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
- 4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
 - a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none);
 - e. Description of the corrective action taken for each exceedance;

- f. Occurrences and duration of each downtime and bypass.

U016 Comment/Explanation:

Additional Condition 2.d is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

U022 Emission Unit Description: Paint Equipment Purging and Overall Plant Cleaning**U022 Applicable Regulations**

Federally Enforceable Regulations		
Number	Subject	Sections
1.05	Compliance With Emission Standards Maintenance Requirements	1; 3 through 5
6.17	Standard of Performance for Existing Automobile and Truck Surface Coating Operations	1 through 4

District Only Enforceable Regulations		
Number	Subject	Sections
1.18	Rule Effectiveness	1 through 3
5.11	Standard of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U022 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring[†]	Control Device		Stack ID
						ID	Type	
E22A	Paint Equipment Purging and Plant Cleaning	1.05, Sec 4	VOC	Same as for 6.17, Sec 3	NONE	N/A	N/A	N/A
		5.11, secs 1 and 6	TAP(s)	See AC 2.b	MON			
		6.17, Sec 3	VOC	See AC 1.a	MON			

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions; **NONE** - No (or no additional) Compliance Monitoring is required.

U022 Additional Conditions:**1. Standards** (Regulation 2.16, section 4.1.1)

a. VOC: The owner or operator shall follow the procedure below to minimize VOC emissions from purge and cleaning operations:

i. Body Wipe:

- 1) Solvents shall be dispensed from pails equipped with properly functioning lids that will remain closed when not in use
- 2) Miscible solvents shall be mixed with deionized water
- 3) Sticky tack cloths shall be used where possible

ii. Applicator Paint Purging:

- 1) The automatic spray applicators will incorporate will incorporate a purge paint and solvent recovery system that will collect ninety percent (90%) of the purged materials
- 2) Compressed air will be used to enhance scrubbing action
- 3) Water-based base coat will be purged with deionized water and alcohol

iii. Spray Booth and Equipment Cleaning:

- 1) Pressurized water and solvent will be used to remove uncured paint
- 2) Sprayable and paper masking will be used, where possible, to minimize cleaning
- 3) High-pressure water scrubber will be used to remove over spray from floor grating
- 4) A non-VOC-containing coating will be applied to booth walls to act as a masking, which shall be removed by low-pressure water or steam
- 5) Manual spray applicators and hoses shall be removed and immersed in a drum of solvent, then wiped clean
- 6) Some portions of the automatic spray applicator will be covered with removable paper masking

iv. Other Areas:

- 1) Paint track-out from booths shall be removed by mopping with a detergent containing solvent.
 - 2) Removable floor mats and disposable paper covering will be used in high-traffic areas to minimize the need for the previous item.
- b. TAPs: See Emission Points Table.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC: See Additional Condition 1.a.
 - b. TAPs:
 - i. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
 - ii. Continue to comply with Regulation 5.11 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
 - iii. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC: See Additional Condition 1.a.
 - b. TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:
 - a. Emission Unit ID number and Control ID number;
 - b. The beginning and ending date of the reporting period;
 - c. Identification of the operating parameters being monitored;
 - d. Number, duration, and cause of all exceedances (or a negative declaration, if none); and
 - e. Description of the corrective action taken for each exceedance.

U022 Comments/Explanations:

1. Additional Condition 2.b is for demonstrating compliance with Regulation 5.11, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.
2. Additional Conditions 1.a.i through iii, involving work practice standards only, have no monitoring requirements, as such would be impractical.

U023 Emission Unit Description: Phosphate**U023 Applicable Regulations**

District Only Enforceable Regulations		
Number	Subject	Sections
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

U023 Emission Points								
ID	Description	Applicable Regulation(s)	Pollutant/ Standard	Allowable Emission/ Equipment Standard	Compliance Monitoring[†]	Control Device		Stack ID
						ID	Type	
E1000	Phosphate	5.12, secs 1 and 5	TAP(s)	See AC 2	MON	N/A	N/A	S1000 through S1004
E1001	Phosphate Dump Tank	5.12, secs 1 and 5	TAP(s)	See AC 2	MON	N/A	N/A	N/A

[†]Compliance Monitoring Reference Codes: **MON** - Periodic monitoring required, See Additional Conditions.

U023 Additional Conditions:

1. **Standards** (Regulation 2.16, section 4.1.1)

TAPs: See Emission Points Table.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

TAPs:

- a. The owner or operator shall monitor and maintain records of the operational parameters(s) being used to assure proper operation of each control device and continued compliance with all applicable emission standards or limits.
- b. Continue to comply with Regulation 5.12 except for those specific pollutants governed by a MACT standard that is or becomes applicable to this source or pollutant.
- c. Not be precluded from requesting these conditions being replaced with another District-approved method of compliance demonstration more suitable to their particular facility and mode of operation.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

TAPs: Evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these records available to the District upon request.

4. **Reporting** (Regulation 2.16, section 4.1.9.3) The owner or operator shall report quarterly the following:

TAPs: None.

U023 Comments/Explanations:

Additional Condition 2 is for demonstrating compliance with Regulation 5.12, standards of performance for emitting toxic air pollutants (TAPs). This condition is a surrogate for hourly emissions records and will monitor ongoing compliance. Note that VOC and HAP emissions record keeping and reporting are specified elsewhere in this permit.

Ford LAP Plant-wide

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-permit Documents

<u>Document</u>	<u>Date</u>
Rule Effectiveness Plan	10 April 1995

Alternative Operating Scenarios

The owner or operator did not request to operate under any alternative operating scenarios in its Title V permit application.

Source-wide HAP Speciation			
HAP	CAS No.	HAP	CAS No.
Benzene (including benzene from gasoline)	71-43-2	Methyl isobutyl ketone	108-10-1
Cumene	98-82-8	Methyl-tert-butylether	1634-04-4
Ethyl benzene	100-41-4	Naphthalene	91-20-3
Ethylene glycol	107-21-1	Toluene	108-88-3
Formaldehyde	50-00-0	Xylenes	1330-20-7
Hexane	110-54-3	Cyanide compounds	N/A
Methanol	67-56-1	Glycol ethers	N/A
Methyl ethyl ketone	78-93-3		

Note: HAPs cited in the table above are those currently known to be used at this plant.

Insignificant Activities		
Description	Quantity	Basis
Internal combustion engines fixed or mobile	Various	Regulation 2.02, Section 2.2
Presses extruding metal/mineral/wood	Various	Regulation 2.02, Section 2.3.1
Brazing, soldering or welding equipment	Various	Regulation 2.02, Section 2.3.4
Woodworking, except for conveying, hogging, or burning wood/sawdust	Various	Regulation 2.02, Section 2.3.5
Lab venting and exhaust systems (non radioactive materials)	Various	Regulation 2.02, Section 2.3.11
Ventilation systems - bakeries & restaurants	Various	Regulation 2.02, Section 2.3.12
Washing or drying fabricated metal or glass; non VOC use; no oil or solid fuel	Various	Regulation 2.02, Section 2.3.15
Residential/domestic equipment	Various	Regulation 2.02, Section 2.3.12
Indoor pm collectors venting indoors; non 5.11, 5.12, or 5.14 related material	Various	Regulation 2.02, Section 2.3.21
Non-halogenated cold solvent parts cleaners - secondary reservoir*	Various	Regulation 2.02, Section 2.3.22
Portable diesel or gasoline storage tanks	Various	Regulation 2.02, Section 2.3.23
Diesel fuel storage tanks (emergency use only)	Various	Regulation 2.02, Section 2.3.25
Closed pressure storage vessels	Various	Regulation 2.02, Section 2.3.26
Portable tote tanks for raw material shipment of solvent - based coatings	Various	Tote tanks are kept closed when not in use. Emission from tanks are negligible, and are accounted for by process material balance.
Backup generators for emergency power. (< 500 hrs/year)	Various	Generators normal use is very low.
Wastewater Pretreatment system.	1	Emissions insignificant

Insignificant Activities		
Description	Quantity	Basis
Fluid Fill (hydraulic fluids, oil, anti-freeze) and Lubricating operations.	Various	Emissions insignificant due to low vapor pressure of materials used.
Miscellaneous maintenance procedures including lubrication, grinding, cleaning, woodworking, etc.	Various	Negligible emissions
Direct heat exchangers < 10 MM Btu/ hr	Various	Regulation 2.02, Section 2.1.1 Natural gas usage accounted for under Part 70 Emission Cap.
Coal storage pile and coal handling	1	Negligible emissions

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
2. Activities identified in Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
 - *a. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of Regulations 6.18 and 7.18, including Section 4 of each.
 - b. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
 - c. No periodic monitoring shall be required for facilities designated as insignificant activities.